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February 2, 2022

**Via ECF**

Hon. Alison J. Nathan, U.S.D.J.  
United States District Court for the  
Southern District of New York  
40 Foley Square, Room 2102  
New York, New York 10007

Hon. Debra Freeman, U.S.M.J.  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Jeffrey M. Goldman v. Sol Goldman Investments LLC, et al.*  
Civil Action No.: 1:20-cv-6727

Dear Judge Nathan and Judge Freeman:

As you are aware, this firm represents Defendants Sol Goldman Investments LLC, Solil Management, LLC, and Jane H. Goldman (collectively, "Defendants") in the above styled matter.

In accordance with Judge Nathan's January 28, 2022 order (ECF 90), we write to inform the Court that the deposition of Ms. Fleytas, which was ordered by Judge Freeman, has been scheduled for February 7, 2022 at 10:00 a.m. Counsel for Plaintiff confirmed their availability, and Ms. Fleytas did the same. While the subpoena is still out for service at the time of this letter being written, a copy of the subpoena was sent to Ms. Fleytas via email one day after Judge Nathan's order was issued. We will provide a further status update to the Court once the deposition has occurred as required by Judge Nathan's order.

Honorable Alison J. Nathan, U.S.D.J.

Honorable Debra Freeman, U.S.M.J.

February 2, 2022

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We are available to discuss this, or any other matter, at the Court's convenience.

Respectfully,

A handwritten signature in blue ink, appearing to be 'J. Bauchner', with a horizontal line extending to the right.

---

Joshua S. Bauchner, Esq.  
Ansell Grimm & Aaron, P.C.  
*Attorneys for Defendants*

cc: All counsel of record (via ECF)